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NO. 99031-0, 99032-8

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

DEPARTMENT OF LABOR AND INDUSTRIES,

Petitioner,

v.

TRADESMEN INTERNATIONAL, LLC

and

LABORWORKS INDUSTRIAL STAFFING SPECIALISTS, INC.

Respondents.

**NATIONAL EMPLOYMENT LAW PROJECT, DR. DAVID
MICHAELS, AND DR. MICHAEL SILVERSTEIN'S BRIEF OF
AMICI CURIAE IN SUPPORT OF PETITIONS FOR
DISCRETIONARY REVIEW**

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I. IDENTITY AND INTEREST OF AMICI

Amici curiae are the National Employment Law Project (“NELP”), Dr. David Michaels and Dr. Michael Silverstein. Drs. Michaels and Silverstein have substantial expertise in occupational safety and health and in identifying and preventing occupational health and safety risks among temporary workers. NELP has for over 50 years advocated for improved labor standards for low wage workers, including improved occupational safety and health standards. Deborah Berkowitz, worker health and safety program director at NELP, is an expert in developing and enforcing occupational health and safety standards. The expertise of *amici*, as well as their interests in this matter, is set forth in more detail in the Motion for Leave to File Brief of Amici Curiae, filed simultaneously herewith.

II. STATEMENT OF THE CASE

The Department of Labor & Industries (“L & I”) issued citations against two staffing agencies—Tradesmen International (“Tradesmen”) and Laborworks International Staffing Specialists (“Laborworks”)—for safety hazards discovered at the host employers¹ to which each staffing agency’s temporary workers had been assigned. In both cases, an industrial appeals

¹ Tradesmen contracted with host employer Dochnahl Construction, an on-site construction contractor. Tradesmen AR 4-5. Laborworks contracted with host employer Strategic Materials, Inc., a recycling facility that sorts and recycles various materials including glass and used needles. Laborworks AR 2.

judge determined that the staffing agencies were not “employers” under the Washington Industrial Safety Health Act (“WISHA”) and vacated the citations, and those decisions were most recently affirmed by the Court of Appeals.

Amici submit this brief not to repeat the arguments of the Petitioner L&I but to argue that there are substantial public policy—as well as legal—reasons to hold the staffing agencies responsible as joint employers, along with the host employers that engaged the staffing agencies to secure the workers. Temporary workers² face unique vulnerabilities that require a robust standard that holds staffing agencies and host employers liable, as joint employers, to ensure temporary workers are well-protected from health and safety hazards. The triangular employment relationship—through which the staffing agency hires and directly employs temporary workers while the host employer supervises their day-to-day work—blurs lines of accountability and degrades working conditions, resulting in high rates of health and safety violations and other illegal conduct. The hyper-precarious nature of temp work exacerbates temporary workers’ vulnerability, because they know that they can lose the opportunity to obtain a permanent position—or even lose their current job at the staffing

² For purposes of this brief “temporary workers” refers to workers hired and employed by staffing agencies and assigned to work for a third party client, the host employer.

agency—if they complain about health and safety conditions at their host employer’s jobsite.

In recognition of temporary workers’ increased risk of work-related injury and illness, Federal OSHA has long emphasized that staffing agencies *and* host employers are jointly responsible for the health and safety of temporary workers. Staffing agencies, in particular, have a duty to diligently inquire about health and safety hazards at host employers’ workplaces to ensure that they are not sending temporary workers to workplaces with hazards from which they are not protected. L&I found that Tradesmen and Laborworks had actual or constructive knowledge of hazards at their host employers’ worksites and breached their duty to ensure that these hazards had been abated. Because WISHA must have standards—and the enforcement of such standards—that are at least as effective in protecting temporary workers as OSHA’s standards and enforcement, this Court should reinstate L&I’s citations against both staffing agencies.

Since 2009, temp work has increased dramatically, especially in low-wage, labor-intensive sectors with high rates of worker injuries. The demand for temporary workers is expected to increase again as the economy recovers from the current recession stemming from the COVID-19 pandemic. As such, it is critical that WISHA hold both staffing agencies and host employers accountable for health and safety standards.

III. ARGUMENT

A. The temporary staffing business model degrades working conditions and increases the vulnerability of the predominantly Black, brown and immigrant workforce that performs temp work.

The temporary staffing business model operates as a triangular employment relationship where temporary workers are hired and employed by staffing agencies and assigned to worksites run by companies known as host employers. Host employers determine the assignments and supervise their temporary workers, who often work with and alongside the host employer's permanent, directly-hired workforce.

Staffing agencies compete for host employers' business on the one major cost they can control—labor costs. The competitive pressure drives down wages and creates incentives for the agencies to cut corners by violating labor standards.³ At the same time, host employers view their temporary workers as expendable so are likely to skimp on training and other investments for these workers.⁴ And, because temporary workers often do not know which party is responsible, the staffing agency and the

³ Laura Padin & Maya Pinto, *Lasting Solutions for America's Temporary Workers*, National Employment Law Project, Aug. 26, 2019, at 3, <https://www.nelp.org/publication/lasting-solutions-americas-temporary-workers/>.

⁴ *Id.* at 4.

host employer can point the finger at each other and disclaim responsibility for temporary workers' exploitative working conditions.

Available data confirms that the temporary staffing business model puts downward pressure on wages and degrades working conditions. Nationwide, full-time temporary workers earn 41 percent less than workers in standard work arrangements.⁵ Even within occupations, the wage disparity is significant. In Washington State, compared to all workers in their relative sector, temporary workers suffer a median hourly wage penalty of 24 percent in the transportation and warehousing sector, 23 percent in the manufacturing sector, 15 percent in computer and mathematics jobs, and 10 percent in office administration jobs.⁶ Temporary workers are also much less likely to have benefits—such employer-provided health insurance or a pension plan—than permanent, direct employees.⁷

⁵ National Employment Law Project, *America's Nonstandard Workforce Faces Wage, Benefit Penalties, According to U.S. Data*, June 7, 2018, <https://www.nelp.org/news-releases/americas-nonstandard-workforce-faces-wage-benefit-penalties-according-us-data/> (analyzing data on temporary workers from the Bureau of Labor Statistics' 2017 Contingent Worker Supplement to the Current Population Survey).

⁶ Bureau of Labor Statistics, *Occupational Employment Statistics, State Occupational Employment and Wage Estimates & State Research Estimates by State and Industry*, May 2019.

⁷ *America's Nonstandard Workforce Faces Wage, Benefit Penalties*, *supra* note 5 (analyzing data on temporary workers from the Bureau of Labor Statistics' 2017 Contingent Worker Supplement to the Current Population Survey).

Even worse, illegal conduct is endemic. Staffing agencies consistently rank among the worst employers for the rate of wage-and-hour violations, according to a *ProPublica* analysis of federal enforcement data.⁸ Race and gender discrimination is also common, with host employers using coded language to signal to staffing agencies their preference for or disfavor of workers of a certain race or gender.⁹ Host employers often express a preference for white or Latinx workers over Black workers, which results in Black workers getting assigned to the least desirable positions, if they get an assignment at all.

Given the substantial wage and benefits penalties and pervasive illegal conduct that accompany temp jobs, it is not surprising that close to half of temporary workers would prefer a permanent position.¹⁰ Yet many temporary workers languish in the same position for several months or even years without being offered a permanent position at the host employer, a circumstance commonly referred to as “perma-temping.” The temporary staffing business model creates a second-tier workforce that does the same

⁸ Michael Grabell, *The Expendables: How Temps Who Power Corporate Giants are Getting Crushed*, PRO PUBLICA, June 27, 2013, <https://www.propublica.org/article/the-expendables-how-the-temps-who-power-corporate-giants-are-getting-crushed>.

⁹ Will Evans, *When Companies Hire Temp Workers by Race, Black Applicants Lost Out*, REVEAL, Jan. 6, 2016, <https://www.revealnews.org/article/when-companies-hire-temp-workers-by-race-blackapplicants-lose-out/>.

¹⁰ America’s Nonstandard Workforce Faces Wage, Benefit Penalties, *supra* note 5.

work as permanent workers but for less pay, nearly non-existent benefits, and no job security.

Workers of color are overrepresented in temporary staffing work in Washington State and across the United States. In Washington State, workers of color are 31 percent of the workforce but over 40 percent of temporary workers. Black workers in Washington State are overrepresented by a factor of 2.5 in jobs that have been subcontracted to staffing agencies.¹¹ Nationally, while Black workers constitute 12.1 percent of the overall workforce, they make up 25.9 percent of temporary workers; Latinx workers are 16.6 percent of all workers, but 25.4 percent of temporary workers.¹² Immigrants are also targeted by staffing agencies. Many “temp towns”—areas inundated with staffing agencies—are located in immigrant communities, such as cities and towns in New Jersey or outside of Chicago, where these agencies can exploit undocumented workers.¹³ People of color and immigrants, encountering racist and discriminatory barriers to stable employment, are left with little choice but to accept poorly-paid, insecure temp work.

B. Temp work increases the risk of getting injured or sick on the job.

¹¹ U.S. Bureau of Labor Statistics, Quarterly Workforce Indicators, 2019.

¹² America’s Nonstandard Workforce Faces Wage, Benefit Penalties, *supra* note 5.

¹³ Grabell, *supra* note 8.

Available data indicates that temporary workers face an increased risk of getting injured or sick on the job. According to a study of injury rates of temporary and permanent workers in Washington State from 2011 to 2015, temporary workers experienced twice the rate of injury as permanent workers.¹⁴ A similar study of workers' compensation claims in Ohio also found higher rates of injury for temporary workers.¹⁵ Finally, a *ProPublica* analysis of workers' compensation programs found that in California and Florida, the two largest states analyzed, temporary workers had about a 50 percent greater risk of being injured on the job than permanent workers.¹⁶ The findings were even more stark for severe injuries. In Florida, for example, temporary workers were about twice as likely as permanent employees to suffer crushing injuries, dislocations, lacerations, fractures, and punctures and three times as likely to suffer an amputation.

The temporary staffing business model increases health and safety risks for workers for several reasons. First, new workers are at greater risk of injury because of less familiarity with safety procedures and protocols,

¹⁴ Michael Foley, *Factors Underlying Observed Injury Rate Differences Between Temporary Workers and Permanent Peers*, AMER. JOUR. OF INDUSTRIAL MEDICINE, Sept. 2017.

¹⁵ Ibraheem S. Al-Tarawneh et al, *Comparative Analyses of Workers' Compensation Claims of Injury Among Temporary and Permanent Employed Workers in Ohio*, AMER. JOUR. OF INDUSTRIAL MEDICINE, Sept. 2019, <https://doi.org/10.1002/ajim.23049>.

¹⁶ Michael Grabell, Jeff Larson & Olga Pierce, *Temporary Work, Lasting Harm*, PROPUBLICA, Dec. 13, 2013, <https://www.propublica.org/article/temporary-work-lasting-harm>.

and most temp workers are “new” multiple times a year.¹⁷ In fact, Federal OSHA has investigated numerous incidents where temporary workers were killed on their first day on the job.¹⁸

Second, because host employers view temporary workers as expendable and not worth the investment in training, they may neglect to adequately train temporary workers on health and safety standards.¹⁹ According to the Washington State study of injury rates of temporary and permanent workers referenced above, over 40 percent of temporary workers said they never received safety training from their host employer, and an additional 35 percent said they only received training at the start of the new job; by contrast, 25 percent of permanent workers reported no safety training, and an additional 20 percent reported training only at the start of employment.²⁰ Temporary workers were also less likely to be screened for previous work experience in the tasks they were expected to perform than permanent workers.²¹

¹⁷ Occupational Safety and Health Admin., Memorandum for Regional Administrators, Policy Background on the Temporary Worker Initiative, July 15, 2014, <https://www.osha.gov/memos/2014-07-15/policy-background-temporary-worker-initiative>.

¹⁸ David Michaels, Occupational Safety and Health Admin., Adding Inequality to Injury: The Costs of Failing to Protect Workers on the Job, June 2015, at 9, https://www.osha.gov/Publications/inequality_michaels_june2015.pdf.

¹⁹ *Id.*

²⁰ Foley, *supra* note 14, at 5.

²¹ *Id. at 6.*

Third, the triangular employment relationship blurs lines of responsibility and thus diminishes both the staffing agency's and the host employer's accountability for health and safety violations. Temporary workers may not know which party is responsible for safety training and for injuries on the job. "OSHA has expressed concern . . . that temp workers get placed in the most hazardous jobs; that temp workers are more vulnerable to workplace hazards and retaliation for reporting these hazards than permanent workers; and that temp workers are not given adequate safety and health training or explanation of duties by either the temp agency or the host employer."²²

Finally, the hyper-precarious nature of temp work exacerbates temporary workers' vulnerability. Temporary workers are hesitant to advocate for themselves—such as reporting workplace injuries and claiming workers' compensation—out of concern that their staffing agency will retaliate and refuse to give them new assignments.²³ Retaliation by host employers is common as well. According to a *ProPublica* report on staffing agencies, a common practice is for host companies to write "DNR"—short for "Do Not Return"—on the back of a temporary worker's work slip at the end of the day, which instructs the staffing agency not to assign the worker

²² Occupational Safety and Health Admin., Protecting Temporary Workers, <https://www.osha.gov/temporaryworkers> (last viewed Nov. 10, 2020).

²³ Michaels, *supra* note 18, at 9.

to this jobsite again.²⁴ Temporary workers who complain about any aspect of an assignment face the threat of being “DNR’d.” As one temporary worker put it, “It’s very difficult to stand up for your own safety. . . because the end result is a DNR.”²⁵

C. In recognition of temporary workers’ unique vulnerabilities, OSHA considers staffing agencies and host employers to be joint employers of temporary workers in most circumstances.

In recognition of temporary workers’ increased risk of work-related injury and illness, OSHA launched the Temporary Worker Initiative in 2013, through which the agency focused on temporary workers “in order to highlight employers’ responsibilities to ensure these workers are protected from workplace hazards” and to emphasize that in most situations the staffing agency and the host employer will be considered joint employers.²⁶ The OSH Act requires that state plans offer at least as effective protection as Federal OSHA in the development and enforcement of occupational safety and health standards.²⁷ WISHA standards and enforcement, therefore, must be at least as effective in protecting temporary workers as

²⁴ Grabell, Larson & Pierce, *supra* note 16.

²⁵ *Id.*

²⁶ Memorandum for Regional Administrators, *supra* note 17.

²⁷ 29 U.S.C. § 667(c)(2). *See also* Occupational Safety and Health Admin., Frequently Asked Questions, <https://www.osha.gov/stateplans/faqs> (last viewed Nov. 9, 2020) (“OSHA approves and monitors all State Plans . . . State-run safety and health programs must be at least as effective (ALEA) as the federal OSHA program.”).

OSHA's enforcement of joint employment against staffing agencies and host employers described in OSHA's Temporary Worker Initiative.

According to OSHA, the staffing agency and the host employer "share control over the workers, and are therefore jointly responsible for temporary workers' safety and health."²⁸ Staffing agencies have "a duty to diligently inquire and determine what, if any, safety and health hazards are present at their client's workplaces" to "ensure that they are not sending workers to workplaces with hazards from which they are not protected or on which they have not been trained," while host employers have responsibility for determining the hazards in their workplaces and complying with worksite-specific requirements.²⁹ In its citation against Tradesmen, L&I found that the staffing agency breached its duty to inspect the host employer's worksites for health and safety hazards because Tradesmen allowed the host company to send its temporary workers to new construction worksites without informing Tradesmen. Tradesmen AR 175-78. One new worksite had obvious fall hazards, which Tradesmen would have noticed had it inspected the worksite. Tradesmen AR 85.

Furthermore, OSHA states that staffing agencies should make efforts to address health and safety issues at host employer's worksites,

²⁸ Protecting Temporary Workers, *supra* note 22.

²⁹ Memorandum for Regional Administrators, *supra* note 17.

including when “information becomes available that questions the adequacy of the host employer's job hazard analyses, such as injury and illness reports, safety and health complaints or OSHA enforcement history . . .”³⁰ In its citation against Laborworks, L&I found that Laborworks knew that its temporary workers faced the risk of puncture wounds from sharp objects at the host employer’s recycling facility, yet it did not provide its workers with safety equipment such as forceps, tongs and pliers.³¹ Laborworks AR 4-5, 203-205. Laborworks therefore breached its duty to ensure that existing hazards of which it had actual knowledge were properly abated.

OSHA also holds host employers and staffing agencies jointly responsible for ensuring that temp workers are protected against bloodborne pathogens. The staffing agency is responsible for providing bloodborne pathogen information and training to temporary workers, ensuring they receive required vaccinations and follow-up, and retaining applicable medical and training records.³² L&I also cited Laborworks for failing to make Hepatitis B vaccinations available to temporary workers who were exposed to bloodborne pathogens and for failing to keep relevant exposure and training records. Laborworks AR 203–10.

³⁰ *Id.*

³¹ Laborworks knew of the hazards at the host employer because two of its temporary workers had been injured in previous poking incidents in 2016. Laborworks AR 5.

³² Occupation Safety and Health Admin., Temporary Worker Initiative Bulletin No. 6, Bloodborne Pathogens, at 2, <https://www.osha.gov/Publications/OSHA3888.pdf>.

In sum, Federal OSHA recognizes that both staffing agencies and host employers have a role to play in ensuring the health and safety of temporary workers and that there are no gaps in protection. In both the *Tradesmen* and *Laborworks* cases, the staffing agencies had constructive or actual knowledge of unsafe conditions at the host employer yet failed to take action to protect their workers. As such, both staffing agencies breached their duties “to inquire and *verify* that the host has fulfilled its responsibilities for a safe workplace.”³³

D. As temporary work increases, it is critical that WISHA hold both staffing agencies and host employers accountable for health and safety standards.

Temp work is on the rise, making a robust joint employment standard critical to protect a growing and especially vulnerable portion of the workforce. Since the end of the Great Recession in June 2009, temp work—as measured by the aggregate number of hours and total number of jobs (part-time and full-time)—has grown faster nationally than work overall. Across the country, temp work hours have grown 3.88 times faster than overall work hours, and temp jobs have grown 4.35 times faster.³⁴ In 2018, temp jobs supplied by staffing agencies reached a new high of 3.2 million in the United States.³⁵

³³ Protecting Temporary Workers, *supra* note 22.

³⁴ Padin & Pinto, *supra* note 3, at 1.

³⁵ *Id.* (analyzing Bureau of Labor Statistics data).

Temp work has especially increased in high-risk, low-wage, labor-intensive occupations, reflecting a shift in corporate use of staffing placements from clerical work to more hazardous industries, such as construction, manufacturing, and logistics. In Washington State, temporary workers comprise two percent of all jobs, but over 13 percent of manufacturing assembly jobs and 12 percent of warehouse package handling jobs.³⁶ Nationally, between 2014 and 2017, the detailed occupation that saw the most substantial increase in temporary workers was “Laborers and Freight, Stock and Material Movers, Hand”, a labor-intensive, low-wage occupation group with significant health and safety risks.³⁷

Just as temp work increased during the last economic recovery, the demand for temporary workers is expected to increase as the economy recovers from the current recession stemming from the COVID-19 pandemic. As such, it is critical that WISHA hold both staffing agencies and host employers accountable for health and safety standards.

³⁶ Bureau of Labor Statistics, Occupational Employment Statistics, State Occupational Employment and Wage Estimates & State Research Estimates by State and Industry, May 2019.

³⁷ *Id.*

IV. CONCLUSION

For the foregoing reasons, *amici curiae* urge the Court to grant review of the Court of Appeals decision below.

RESPECTFULLY SUBMITTED this 17th day of November, 2020.

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CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2020, I caused the foregoing Brief of Amici Curiae in Support of Petitions for Discretionary Review to be filed with the clerk of the court via the e-filing web portal, which will automatically provide of such filing to all required parties.

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NATIONAL EMPLOYMENT LAW PROJECT

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